Notice of Intent to Prepare the NPR-A IAP/EIS
Jim Dau comments
January 22, 2019

My name is Jim Dau. I reside in Kotzebue, Alaska. I am a retired wildlife biologist and pilot for the Alaska Department of Fish and Game (ADFG). At the time of my retirement (1 May, 2016), I was the ADF&G lead research and management biologist for the Western Arctic Caribou Herd. I submit these comments as a private citizen solely in my behalf.

The November 2, 2018 letter jointly submitted by the Alaska Department of Natural Resources (DNR) and North Slope Borough (NSB) to Joseph Balash (Department of Interior, DOI) requesting an update of the NPR-A Integrated Activity Plan is based on their shared desire for the DOI to "….make more investment in our infrastructure and to help build capacity to support our aligned goals." Their letter expresses a desire to balance "….economic opportunities and subsistence traditions."

Unfortunately, even over the short term and a regional level, the reality is that resource development to produce economic benefits for man comes with costs to fish, birds, animals, and their habitat. Those environmental impacts in turn affect the people who rely on those resources for subsistence, or who value them for their intrinsic worth. Even when resource development occurs without substantially impacting the distribution or abundance of wildlife, it can still impose significant costs on subsistence users. This is because new roads immediately or eventually increase access for people into remote areas that have historically been only lightly used for subsistence activities. State of Alaska Hunting Regulations show that areas without roads generally have less complex hunting regulations with longer seasons and higher bag limits than areas near roads. Consistent with this, ADFG's Subsistence Division documented significantly lower per capita harvest levels of subsistence resources by Alaska residents who live near roads compared to those who live in roadless areas (Wolfe and Walker 1987).

Multiple development projects compound their individual effects on wildlife and people. This is particularly true for mobile species, such as birds and caribou, that range over large areas thus increasing their exposure to infrastructure. North Slope caribou herds have been exposed to oil production and transportation infrastructure on the North Slope for >40 years. Additionally, caribou from the Western Arctic (WAH) and Teshekpuk (TCH) herds have contacted the Red Dog mine, road and port site for roughly 30 years. Several additional large-scale resource development projects currently being considered for areas used by North Slope caribou herds include: oil production in ANWR (the EIS process is currently under way); development of the Ambler Mining District with a 200-mi access road that connects it to the Dempster Highway; and construction of a pipeline to transport natural gas from North Slope reservoirs to southern processing or transportation facilities. Development within NPR-A, as requested by the NSB and DNR, must be considered in the context of these cumulative impacts – even those that are south of the North Slope but affect northern caribou herds –currently under consideration.

Although short term, regional impacts of development on wildlife and users can be significant, they pale in comparison to the predictions of long term environmental and social impacts from global warming.

The United Nations Intergovernmental Panel on Climate Change (www.ipcc.ch) has released many reports that describe the mechanics of global warming, project climate change and associated risks into the future, and discuss potential responses to slow climate change in the context of sustainable development. Similarly, during November 2017, the U.S. Global Change Research Program released a report (Vol. 1) that documented greenhouse gas emissions, primarily from combustion of fossil fuels, as the key driver of climate change. Their second report (Vol. 2, November 2018) linked climate change to issues already impacting man and the global environment. These include: droughts, devastating wildfires, the spread of disease, warming of ocean temperatures, and diminishing ice cover in the Arctic and Antarctic. A consistent theme among these reports is the immediate need for man to significantly reduce his dependence on fossil fuels in order to reduce greenhouse gas emissions and even just slow this warming trend.

At high latitudes, such as in northern Alaska, climate change is occurring at more than twice the rate of warming in more temperate latitudes. In northern and northwestern Alaska, warming air and sea water temperatures are already affecting the thickness, timing and coverage of sea ice; temporal patterns of migratory movements by caribou and birds; northward expansion of reproductive ranges by some bird and animal species; coastal erosion from severe storms; sea bird mortality events; thermal erosion of ice-rich tundra and river banks; and other manifestations.

Given likely regional and global impacts from infrastructure and climate change on people, wildlife and its habitat, I do not support developing a new Integrated Activity Plan and Environmental Impact Statement to facilitate oil development and construction of infrastructure in NPR-A. Instead, I strongly prefer retaining the 2016 IAP.

If a new IAP and EIS are developed for NPR-A, I recommend the Utukok River Uplands Special Use Area (SUA) and Teshekpuk Lake SUA be retained, and that these areas remain unavailable for leasing, exploratory drilling, or establishment of non-subsistence infrastructure. The Utukok SUA contains the WAH calving grounds, and the Teshekpuk SUA contains critical calving and insect relief habitat for the TCH. These two caribou herds are vital to subsistence users who reside on the North Slope, in Kotzebue Sound, and in Norton Sound, and they are ecologically important for this entire ecosystem.

Many caribou herds throughout North America, including Alaska, have substantially declined during the last 10-30 years. Even though the causes of these declines are not well understood, it would be imprudent to significantly modify caribou ranges through man-made modifications if we genuinely want to preserve these animals for everyone who values them, including subsistence users.